

Message Information

Date 04/19/2011 02:36 PM
From Vickie Patton <vpatton@edf.org>
To LisaP Jackson/DC/USEPA/US@EPA; "ray.lahood@dot.gov"
<ray.lahood@dot.gov>
cc Mark MacLeod <mmacleod@edf.org>; Kathryn Phillips <KPhillips@edf.org>
Subject Vehicle Labels: Making America Stronger

Message Body

Dear Administrator Jackson and Secretary LaHood,

The comprehensive updating of the passenger vehicle fuel economy label for the first time in years provides a pivotal opportunity to empower consumers – at a time when the security threats associated with our nation's dependence on foreign oil are profound, American families are hard hit by rising gas prices, and the dangerous rise of climate-disrupting pollution imperils our health and well-being. Environmental Defense Fund respectfully reiterates its strong support for a clear and concise passenger vehicle label that provides accurate and meaningful information to consumers of all vehicle classes. Labels are an important tool to help consumers compare vehicle fuel consumption, the fuel cost savings to be realized through more efficient vehicles, and vehicle air pollution including climate-disrupting greenhouse gases.

We strongly encourage the Agencies to adopt a label that contains an easy-to-read ranking system that is prominently displayed. EPA and DOT conducted an extensive consumer-based research program to inform the development of the proposed new labels. The consumer participants consistently recommended a clear label that is familiar, easy to understand and concise. Letter grades are especially effective in conveying information about fuel consumption and greenhouse gas pollution because consumers are familiar with such grading systems and they provide a salient representation of more detailed information.

We also urge that the label include fuel cost savings over five years. The Agencies heard from consumers that fuel costs and saving money are important factors on a fuel economy label. Empowering consumers with information about *fuel cost savings* will help consumers better understand the options before them, resulting in more informed purchasing decisions. Today's rising fuel prices only underscore the vital importance of this information to consumers across our nation.

In today's 21st Century consumer market, online research is integral to vehicle shopping and purchasing. We urge the Agencies to use the www.fueleconomy.gov website to develop an online label for each vehicle that provides consumers with additional information that may not fit on the window sticker. The online label could be more colorful, informative and interactive than

the label on the vehicle window.

The Energy Independence and Security Act of 2007 calls for final action on the vehicle label by June 2011. We respectfully urge you to complete timely action on an improved vehicle label that empowers consumers through clear, accessible information on fuel economy and greenhouse gas pollution performance by adopting "a rating system that would make it easy for consumers to compare the fuel economy and greenhouse gas and other emissions of automobiles at the point of purchase...." See Energy Independence and Security Act, Pub. L. No. 110-140, §105, 121 Stat. 1492 (2007).

Sincerely,

Vickie Patton

Vickie Patton
General Counsel
Environmental Defense Fund

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April 19, 2011

BY EMAIL AND U.S. MAIL TRANSMISSION

The Honorable
Lisa Jackson
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

The Honorable
Ray LaHood
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

**Re: Final Rulemaking to Revise Fuel Economy and Emissions Performance
Labels for Light-Duty Vehicles**

Dear Administrator Jackson and Secretary LaHood:

The comprehensive updating of the passenger vehicle fuel economy label for the first time in years provides a pivotal opportunity to empower consumers – at a time when the security threats associated with our nation's dependence on foreign oil are profound, American families are hard hit by rising gas prices, and the dangerous rise of climate-disrupting pollution imperils our health and well-being. Environmental Defense Fund respectfully reiterates its strong support for a clear and concise passenger vehicle label that provides accurate and meaningful information to consumers of all vehicle classes. Labels are an important tool to help consumers compare vehicle fuel consumption, the fuel cost savings to be realized through more efficient vehicles, and vehicle air pollution including climate-disrupting greenhouse gases.

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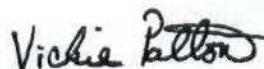
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Sincerely,

A handwritten signature in black ink that reads "Vickie Patton". The signature is written in a cursive, flowing style.

Vickie Patton
General Counsel
Environmental Defense Fund